

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JOE JOHNSON,)	
)	
Plaintiff,)	
)	No. 8:22-cv-02422-TDC
v.)	
)	Hon. Theodore D. Chuang
THINK COMPUTER CORPORATION)	
d/b/a PLAINSITE,)	
)	
Defendant.)	

AMENDED NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, and Local Rule 103.5, Defendant Think Computer Corporation files this Amended Notice of Removal and states as follows:

1. Think Computer Corporation is a defendant in Case Number CAL22-21998 filed in the Circuit Court of Maryland for Prince George’s County.
2. This action began when Plaintiff filed a civil action on June 15, 2022 in the District Court for Prince George’s County, Maryland against “Think Computer Corporation.” The Civil Action was assigned Case No. 050200123222022.
3. Think Computer Corporation was never served with the District Court summons or complaint.
4. On or about July 20, 2022, the Civil Action was transferred to the Circuit Court for Prince George’s County and assigned Case No. CAL22-21998.
5. Think Computer Corporation was served with a summons and complaint in the Civil Action by delivery on September 6, 2022, via First Class Mail to its mail forwarding service, which in turn forwarded the documents to the company’s owner, Aaron Greenspan. A copy of

the Circuit Court Complaint is attached as Exhibit A. The Complaint alleged compensatory damages of \$25,000 plus general, special, and punitive damages, as well as costs and reasonable attorney fees.

6. At the present time, at the commencement of the Civil Action in the District Court for Prince George's County, Maryland, and at the time of the filing of the Circuit Court Complaint in the Circuit Court for Prince George's County, Maryland, Plaintiff is and was an individual citizen of the State of Maryland.

7. At the present time, at the commencement of the Civil Action in the District Court for Prince George's County, Maryland, and at the time of the filing of the Circuit Court Complaint in the Circuit Court for Prince George's County, Maryland, Think Computer Corporation is and has been a corporation that is incorporated in Delaware and has its principal place of business in California. Hence, Think Computer Corporation is a citizen of Delaware and California.

8. As set forth in the Circuit Court Complaint, Plaintiff seeks \$100,000.00 or more in damages, in that he pleads claims for \$25,000 in compensatory damages, plus general and special damages, punitive damages, and attorney fees, in his claim against Defendant. Consequently, the amount in controversy in the Circuit Court Complaint exceeds the sum of \$75,000.00, exclusive of interest and costs.

9. Accordingly, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332, as there is complete diversity among all parties, and the amount in controversy exceeds \$75,000.00. Thus, the above-captioned action may be removed pursuant to 28 U.S.C. § 1441(b).

10. The following process, pleadings, documents and orders have been served upon Think Computer Corporation in the actions filed in the Circuit Court for Prince George's County, Maryland:

- Notice of Transfer to the Circuit Court for Prince George’s County dated July 20, 2022, and mailed July 26, 2022, attached hereto as Exhibit A;
- Plaintiff’s Complaint and Summons filed in the Circuit Court for Prince George’s County on August 15, 2022, attached hereto as Exhibit B.
- Scheduling Order, attached hereto as Exhibit C.

If other documents have been filed in the Circuit Court, they will be submitted within thirty days.

WHEREFORE, Think Computer Corporation removes this subject action from the Circuit Court for Prince George’s County to this United States District Court for the District of Maryland.

Respectfully submitted,

/s/ Oliver L. Edwards
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/s/ Paul Alan Levy
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September 28, 2022